

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

IN RE GALENA BIOPHARMA, INC.  
SECURITIES LITIGATION,

CASE No.:3:14-cv-00367-SI

**MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND APPROVAL OF  
NOTICE PLAN**

Pursuant to Federal Rule of Civil Procedure 23(e) and for the reasons set forth in the accompanying Memorandum of Points and Authorities, Court-appointed Class Representatives Kisuk Cho, Anthony Kim, Pantelis Lavidas, and Joseph Buscema (collectively, “Class Representatives” or “Plaintiffs”), by and through their undersigned attorneys, hereby move this court for entry of an Order (a) preliminarily approving the settlement between Plaintiffs and Defendants Michael McCarthy, The DreamTeam Group, LLC, Lidingo, LLC, and Kamilla Bjorlin (the “Remaining Defendants”) (b) approving the notice to the Class of the Settlement; and (c) setting a hearing date for final approval of the Settlement. The Remaining Defendants do not oppose the relief requested by this motion.

Dated: May 17, 2017

Respectfully submitted,

/s/ Phillip Kim (pro hac vice)

**THE ROSEN LAW FIRM, P.A.**

Laurence M. Rosen (pro hac vice)

Phillip Kim (pro hac vice)

275 Madison Avenue, 34<sup>th</sup> Floor

New York, NY 10016

Phone: (212) 686-1060

Fax: (212) 202-3827

Email: lrosen@rosenlegal.com

-and-

**POMERANTZ LLP**

Patrick V. Dahlstrom

Leigh Handelman Smollar

Ten South LaSalle Street, Suite 3505

Chicago, Illinois 60603

Tel: (312) 377-1181

**POMERANTZ LLP**

Jeremy A. Lieberman (pro hac vice)

600 Third Avenue, 20<sup>th</sup> Floor

New York, NY 10016

Tel: 212-661-1100

*Co-Class Counsel*

**RANSOM, GILBERTSON, MARTIN &  
RATLIFF, L.L.P.**

Jeffrey Ratliff

1500 NE Irving Street, Suite 412

Portland, Oregon 97232

Tel: 503-226-3664

*Liaison Counsel for Class Representatives and the  
Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record who have consented to electronic notification. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to all non-CM/ECF participants.

DATED: May 17, 2017

/s/ Phillip Kim